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CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

CR22-00598 TUC-SHR(JR)

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE DISTRICT OF ARIZONA

10 United States of America,

11 Plaintiff,

12 vs.

14 Matthew Alan Chambers,

15 Defendant.

INDICTMENT

Violations:

18 U.S.C. § 2252(a)(2) and (b)(1)  
(Distribution of Child Pornography)  
Counts One through Four

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)  
(Knowing Access of Child Pornography)  
Count Five

18 U.S.C. §2253  
(Forfeiture Allegation)

19 VICTIM CASE  
20  
21

22 THE GRAND JURY CHARGES:

23 COUNT ONE

24 **DISTRIBUTION OF CHILD PORNOGRAPHY**

25 On or about May 30, 2021, in the District of Arizona, MATTHEW ALAN  
26 CHAMBERS, using any means or facility of interstate and foreign commerce, did  
27 knowingly distribute child pornography, that is, visual depictions, the production of which  
28 involved the use of minors engaging in sexually explicit conduct, as defined in Title 18,

1 United States Code, Section 2256(2), and which depicted such conduct, which had been  
2 shipped and transported in interstate and foreign commerce by means of computer, or  
3 otherwise, including, but not limited to, the following file:

4 “000001.avi.”

5 All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

6 **COUNT TWO**

7 **DISTRIBUTION OF CHILD PORNOGRAPHY**

8 On or about June 1, 2021, in the District of Arizona, MATTHEW ALAN  
9 CHAMBERS, using any means or facility of interstate and foreign commerce, did  
10 knowingly distribute child pornography, that is, visual depictions, the production of which  
11 involved the use of minors engaging in sexually explicit conduct, as defined in Title 18,  
12 United States Code, Section 2256(2), and which depicted such conduct, which had been  
13 shipped and transported in interstate and foreign commerce by means of computer, or  
14 otherwise, including, but not limited to, the following files:

15 “Phantom Production 2002 Preteen Pedo Little Boys 5Yo To 12Yo Kids  
16 Childs Nude Kdv Pjk Rbv Shx Fenerbahce Rizmaster Gay Sex Vip Gay Club  
17 Exclusive 0000059.jpg”

18 “pictures from ranchi torpedo dloaded in 2009- pedo kdv kidzilla pthc  
19 toddlers 0yo 1yo 2yo 3yo 4yo 5yo 6yo 9yo tara babyj (6) (1).jpg”

20 “pictures from ranchi torpedo dloaded in 2009- pedo kdv kidzilla pthc  
21 toddlers 0yo 1yo 2yo 3yo 4yo 5yo 6yo 9yo tara babyj (100)(1).jpg”

22 “pictures from ranchi torpedo dloaded in 2009- pedo kdv kidzilla pthc  
23 toddlers 0yo 1yo 2yo 3yo 4yo 5yo 6yo 9yo tara babyj (258).jpg”

24 All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

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### **COUNT THREE**

# DISTRIBUTION OF CHILD PORNOGRAPHY

On or about June 28, 2021, in the District of Arizona, MATTHEW ALAN CHAMBERS, using any means or facility of interstate and foreign commerce, did knowingly distribute child pornography, that is, visual depictions, the production of which involved the use of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and which depicted such conduct, which had been shipped and transported in interstate and foreign commerce by means of computer, or otherwise, including, but not limited to, the following file:

“vcky-faf-all.mpg”

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

**COUNT FOUR**

# DISTRIBUTION OF CHILD PORNOGRAPHY

On or about July 18, 2021, in the District of Arizona, MATTHEW ALAN CHAMBERS, using any means or facility of interstate and foreign commerce, did knowingly distribute child pornography, that is, visual depictions, the production of which involved the use of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and which depicted such conduct, which had been shipped and transported in interstate and foreign commerce by means of computer, or otherwise, including, but not limited to, the following files:

“01 01 166.jpg”

“23.08.2005 0-40-33 0085.jpg”

“008049.JPG”

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

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## COUNT FIVE

## **KNOWING ACCESS OF CHILD PORNOGRAPHY**

3       Beginning on a date unknown but including the time period between May 30, 2021,  
4 and continuing through August 27, 2021, in the District of Arizona, MATTHEW ALAN  
5 CHAMBERS, using any means or facility of interstate and foreign commerce, did  
6 knowingly access with intent to view child pornography, that is, visual depictions, the  
7 production of which involved the use of minors engaging in sexually explicit conduct, as  
8 defined in Title 18, United States Code, Section 2252(a)(4)(B), and which depicted such  
9 conduct, which had been shipped and transported in interstate and foreign commerce by  
10 means of computer, or otherwise; that is, MATTHEW ALAN CHAMBERS did use an  
11 Acer Predator Helios 300 laptop and the internet to view child pornography images  
12 including, but not limited to, the following files:

“0000123\_Carved.jpg”  
“0000171\_Carved.jpg”  
“0000657\_Carved.jpg”  
“0000779\_Carved.jpg”  
“0001018\_Carved.jpg”  
“0001122\_Carved.jpg”  
“0005099\_Carved.jpg”  
“0005111\_Carved.jpg”  
“0005135\_Carved.jpg”  
“0005186\_Carved.jpg”  
“0005192\_Carved.jpg”

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

## **FORFEITURE ALLEGATION**

Upon conviction of one or more of the child pornography offenses alleged in Counts One through Five of this Indictment, defendant, Matthew Alan Chambers, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253, any and all matter which contains any visual depictions, which were produced, transported, mailed, shipped or received; and any and all property, real or personal, used or intended to be used to commit or to promote the commission of the offenses, including but not limited to Acer Predator Helios 300 laptop with serial number NHQ9WAA003038027632600.

If any of the property described above, as a result of any act or omission of the defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendant.

All pursuant to Title 18, United States Code, Section 2253 and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL.

/S/

**FOREPERSON OF THE GRAND JURY**  
Dated: March 30, 2022

**GARY M. RESTAINO**  
United States Attorney  
District of Arizona

REDACTED FOR  
PUBLIC DISCLOSURE

/S/

CARIN C. DURYEE  
REBECCA S. GARVEY  
Assistant U.S. Attorney